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Attorneys for Defendant Zuffa, LLC

UNITED STATES DISTRICT COURT FOR NEVADA

EVERETT BLOOM, on behalf of himself, and
those similarly situated,

Plaintiff,

v.

ZUFFA, LLC,

Defendant.

Case No.: 2:22-cv-00412-RFB-BNW

**JOINT STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
DEADLINES FOR CLASS
CERTIFICATION**

This stipulation is between Plaintiff, Everett Bloom, on behalf of himself, the general public and those similarly situated ("Plaintiff") and Zuffa, LLC ("Defendant"). The Parties have agreed as follows:

1 WHEREAS, the Court's May 25, 2022 Case Management Order (ECF 32) set a deadline
2 of January 4, 2023, for Plaintiff's motion for class certification and disclosure of experts and
3 expert reports relating to class certification, as well as attendant opposition and reply deadlines.
4

5 WHEREAS, following the Case Management Order, the parties negotiated Protective and
6 ESI Orders that were mutually agreeable, which were adopted by this Court on July 26, 2022
7 (ECF 36 & 37).

8 WHEREAS, in accordance with the ESI Order, the parties have been meeting and
9 conferring in good faith to agree upon a search methodology for Defendant's production of
10 electronically stored information ("ESI"). *See* ECF 37 at 2.

11 WHEREAS, the parties have made significant progress in this regard and reached
12 agreement on an initial set of custodians and search terms on October 27, 2022 (the "agreed ESI
13 searches").

14 WHEREAS, Defendant has and will continue to produce documents on a rolling basis in
15 response to Plaintiff's first set of requests for production and pursuant to the agreed ESI
16 searches.

17 WHEREAS, Plaintiff believes additional time is necessary to review those documents,
18 obtain follow-up searches, and conduct informed depositions prior to the current January 4, 2022
19 motion for class certification deadline.

20 WHEREAS, the parties have met and conferred and agree that the case schedule should
21 be extended by 90 days to allow additional time for discovery.

22 Therefore, the parties hereby stipulate to a 90-day extension of the current class
23 certification briefing schedule, as follows:

- 24 • The deadline for Plaintiff's Motion for Class Certification and Disclosure of
25 Expert(s) and Export Report(s) Relating to Class Certification will be due by
26 April 4, 2023;

- Defendant's Opposition to Motion for Class Certification and Disclosure of Expert(s) and Expert Report(s) Relating to Class Certification will be due by June 2, 2023 (i.e., 59 days after Plaintiff's Motion is filed);
- Plaintiff's Reply Brief in Support of Motion for Class Certification and Rebuttal Expert Report(s) in Support of Class Certification will be due by August 1, 2023 (60 days after Zuffa's Opposition is filed);
- Hearing on Motion for Class Certification shall be 14 days after Plaintiff's Reply is filed, or as soon thereafter as the parties may be heard.

STIPULATED AND AGREED to this 28th day of November 2022.

By: /s/David Markman
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ORDER

The Court having considered the Parties' joint stipulation, and good cause appearing:

IT IS ORDERED THAT:

- The deadline for Plaintiff's Motion for Class Certification and Disclosure of Expert(s) and Expert Report(s) Relating to Class Certification will be due by April 4, 2023;
- Defendant's Opposition to Motion for Class Certification and Disclosure of Expert(s) and Expert Report(s) Relating to Class Certification will be due by June 2, 2023 (i.e., 59 days after Plaintiff's Motion is filed);
- Plaintiff's Reply Brief in Support of Motion for Class Certification and Rebuttal Expert Report(s) in Support of Class Certification will be due by August 1, 2023 (60 days after Zuffa's Opposition is filed);
- Hearing on Motion for Class Certification shall be 14 days after Plaintiff's Reply is filed, or as soon thereafter as the parties may be heard.

IT IS SO ORDERED

DATED: 3:03 pm, November 29, 2022



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE